

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ANDREW BEMPAH,	
Plaintiff,	
vs.	Case No. 22-cv-00748
MIDLAND CREDIT MANAGEMENT, INC.,	Hon. Rebecca R. Pallmeyer
Defendant(s).	Designated Magistrate Judge: Hon. Jeffrey Cummings

**DEFENDANT MIDLAND CREDIT MANAGEMENT, INC.'S**  
**RULE 68 OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Midland Credit Management, Inc. ("Midland") hereby offers to allow judgment to be entered against it and in favor of Plaintiff ANDREW BEMPAH ("BEMPAH") on all claims in BEMPAH's Complaint in the above-captioned action on the following terms:

1. Awarding damages in the amount of \$1,001.00 plus reasonable attorneys' fees, litigation expenses, and costs of suit incurred by Plaintiff BEMPAH.
2. This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability or wrongdoing on the part of Midland, or as an admission that BEMPAH has suffered any damages caused by the alleged wrongdoing of Midland.
3. This offer of judgment is intended to resolve all of BEMPAH's claims in the Complaint, including, without limitation, any and all claims for compensatory damages, actual damages, statutory

damages, attorneys' fees, litigation expenses and costs of suit. This offer of judgment shall not be filed with the Court unless a) accepted, or b) in a proceeding to determine the reasonableness hereof.

DATED: March 28, 2022

MIDLAND CREDIT MANAGEMENT, INC.

By: /s/Brian D. Nevel  
One of its attorneys

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#### **CERTIFICATE OF SERVICE**

I, Brian D. Nevel, an attorney, certify that, on March 28, 2022, I electronically served the foregoing upon:

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/s/ Brian D. Nevel